

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)
v.) Case No. 1:20-CR-143
ZACKARY ELLIS SANDERS,)) Honorable T.S. Ellis, III
Defendant.)) Trial: February 9, 2021

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UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

The United States of America, by and through its counsel, G. Zachary Terwilliger, United States Attorney, Jay V. Prabhu, Assistant United States Attorney, and William G. Clayman, Special Assistant United States Attorney (LT), respectfully submits the attached proposed voir dire and requests that the Court consider the questions contained herein, as may be appropriate, along with the Court's standard voir dire.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: _____ /s/
William G. Clayman
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PROPOSED VOIR DIRE QUESTIONS

1. Have you or anyone you know been accused of being involved with child pornography or of having sexual contact with an individual under the age of 18, regardless of whether the accusation was true or false?
2. Have you or anyone you know been accused of sexually abusing, assaulting, or harassing anyone, including a child, regardless of whether the accusation was true or false?
3. Have you ever known anyone who was falsely accused of sexual abuse, assault, or harassment?
4. Do you disagree with the law that states that, despite what a minor says or does, a minor can never be deemed to have consented to any sexual activity with an adult? Would you have difficulty following an instruction from the Court that consent is not a defense to a charge of production of child pornography?

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: _____/s/
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